

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE

MARIA DE LOURDES DELGADO VELAZQUEZ

DEBTOR

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CASE NO. 10-00929 ESL

CHAPTER 13

MOTION REQUESTING CONVERSION TO CHAPTER 7

TO THE HONORABLE COURT:

COMES NOW, MARIA DE LOURDES DELGADO VELAZQUEZ, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. Debtor may be a debtor under Chapter 7, 11 U.S.C. §1307(f).
2. Debtor may convert a case under Chapter 13 to a case under Chapter 7 of Title 11 at any time, 11 U.S.C. §1307(a).
3. There has been a prior case, 97-04713 SEK7, *Order* of discharge granted on August 23, 1999, and no prior conversions.
4. The Schedules and Statement of Financial Affairs have been filed in the case and unless the court otherwise orders it shall be deemed filed in the Chapter 7 case, Rule 1019(1)(A), Federal Rules of Bankruptcy Procedure.

WHEREFORE, the debtor respectfully requests that this Honorable Court grant this motion, convert this Chapter 13 case to one under Chapter 7 and enter relief pursuant to Chapter 7 of Title 11, United States Code.

NOTICE: Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006 (f) if you were served by mail, any party against whom this paper has been served, or any other party to the action that objects to the relief sought herein shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law;

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(ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

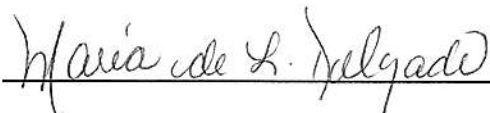
I **CERTIFY** that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notification to the following: Chapter 13 Trustee, Alejandro Oliveras Rivera, Esq.; to the United States Trustee's Office; and I also certify that I have sent a copy of this motion via regular mail to the debtor Maria De Lourdes Delgado Velazquez, HC 01 Box 29030 Apartado 61 Caguas PR 00725; and to all creditors appearing in the master address list, hereby attached.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 17th day of June, 2013.

/s/ Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
ATTORNEY FOR PETITIONER
PO BOX 186 CAGUAS PR 00726
TEL NO 787-744-7699 FAX 787-746-5294
Email: rfigueroa@rfclawpr.com

Certifico haber leído esta moción y que la misma fue redactada según mis instrucciones. En Caguas, PR a 15 de junio de 2013.



MARIA DE LOURDES DELGADO VELAZQUEZ

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